

Interim Emissions Workgroup Recommendations
September 2005

The Interim Emissions Workgroup was tasked to develop recommendations to states and Federal Land Managers for emissions control options associated with oil and gas production and transportation prior to the formation of the Interagency Task Force. The Task Force may require 18-24 months to finalize recommendations for control technologies, and during this time oil and gas development could occur at a rapid pace. This workgroup has finalized the following recommendations to states and Federal Land Managers:

1. **A 2 g/hp-hr NO_x limit is achievable and reasonable for all engines less than 300 hp (excluding very small engines with horsepower less than 40).**

Implementation of this emission limit may lead to reduction of 60-80% of NO_x emissions that might otherwise occur. This reduction in NO_x emissions from these smaller engines is necessary to ensure that visibility is not significantly degraded at Class I areas in the Four Corners region. There are several engine manufacturers that already have smaller lean-burn engines on the market; catalytic reduction (NSCR) air pollution control can be added to engines without lean-burn technology at a reasonable cost. The use of the NSCR technology may increase ammonia emissions in the area, but these emissions have not been quantified. Increased ammonia emissions in the Four Corners region may or may not affect visibility. Without control limits on these small engines now, there is potential that air quality in the region could exceed standards and requirements in the future and that would limit future development of resources in the area. Implementation of an achievable standard is desirable to ensure full development of oil and gas in a way that least impacts the environment. States and Federal Land Managers should develop mechanisms for enforcing this requirement. Enforcement may consist of nameplate verification.

ACTIONS: New Mexico has sent a letter to BLM and BLM-Farmington has incorporated this requirement into all Applications for Permit to Drill as of August 1, 2005. Colorado is waiting for the Record of Decision (ROD) on the NSJB EIS before proceeding.

2. **An ambient monitoring program for ammonia should be initiated in the Four Corners region.** The purpose of the monitoring program is to assess the importance of ammonia to visibility in the region. Visibility modeling is less accurate for the region because of the lack of ammonia data specific to the region. The data will allow further assessment of the impacts of ammonia emissions from NSCR technology on visibility. USEPA Region 6 has initiated plans to assist states in conducting this analysis.

ACTIONS: Monitoring program will likely commence 2nd quarter of 2006 and run through 2007.

3. **Further data on the emissions of ammonia from engines less than 300 hp with NSCR technology is desirable.** Field-testing is preferable. Funding would need to be secured and a contractor would need to be hired to gather this data.
ACTIONS: Currently unfunded, no known implementation date.
4. **A 1 g/hp-hr NO_x limit is reasonable and achievable for engines greater than 300 hp.** Limits for these engines can easily be met with lean-burn technology engines that are widely available from engine manufacturers. This limit is necessary to reduce impacts to visibility that would otherwise occur, and also to ensure that NAAQS and PSD increments are not exceeded. The limit would reduce deposition.
ACTIONS: Requires state initiative, including possible statutory changes. Colorado and New Mexico will consider. No schedule for implementation at this time.
5. **Drill rig NO_x emissions are significant cumulatively in the region on a year-round basis and should be reduced by a requirement to comply with Tier 2 standards as expeditiously as possible.** Emissions from drill rigs cumulatively likely contribute to visibility degradation in the region. This recommendation is consistent with the Region 8 Oil and Gas Initiative and with recent Wyoming DEQ recommendations. This requirement may not be practical for BLM to enforce. States should analyze potential initiatives to achieve emissions reductions from these sources to reduce deposition, the cumulative impacts to visibility and ensure compliance with the NAAQS and PSD increments.
ACTIONS: States and FLMs may consider initiatives. No schedule for implementation at this time.